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21 Attorneys for Plaintiff

16 **UNITED STATES DISTRICT COURT**  
17  
**DISTRICT OF NEVADA**

18 NAVAJO HEALTH FOUNDATION – SAGE  
19 MEMORIAL HOSPITAL, INC. (doing  
20 business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

21 Plaintiff,

Case No. 2:19-cv-0329-GMN-EJY

22 vs.

23 RAZAGHI DEVELOPMENT COMPANY,  
24 LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
25 AHMAD R. RAZAGHI; individually, TAUSIF  
26 HASAN; individually, DOES 1-10;

**JOINT STIPULATION TO EXTEND  
TIME FOR PLAINTIFF TO RESPOND  
TO DEFENDANTS’ OBJECTIONS TO  
THE UNITED STATES MAGISTRATE  
JUDGE’S ORDER AND REPORT AND  
RECOMMENDATION**

27 Defendants.

**(SECOND REQUEST)**

28

1       The parties, by and through their respective counsel, hereby stipulate to permit Plaintiff  
2 an additional 1 business day, or until March 8, 2021, to respond to Defendants' Objections to  
3 the United States Magistrate Judge's January 15, 2021 Order and Report and Recommendation.  
4 This is the parties' second request related to the matters set forth herein. The parties  
5 respectfully request that the Court approve this Stipulation. In support of this Stipulation, the  
6 parties rely upon the facts set forth below.

7       The United States Magistrate Judge assigned to this matter issued an Order and a Report  
8 and Recommendation ("Report") on January 15, 2021. ECF No. 117. Defendants filed an  
9 Objection to that Report on February 12, 2021. ECF No. 121. Pursuant to this Court's Local  
10 Rules of Civil Practice, Plaintiff is permitted a response to the Objection filed by Defendants.  
11 Plaintiff's current deadline for filing that response is March 5, 2021. Undersigned counsel,  
12 however, has notified undersigned defense counsel that while he has substantially completed a  
13 response to the Defendants' Objection (ECF No. 121), he needs additional time to have his co-  
14 counsel review and approve the filing. Additionally, undersigned counsel for Plaintiff was only  
15 recently able to obtain an appointment today for the COVID vaccine and will need to leave the  
16 office to receive that. In light of the foregoing, the parties stipulate and agree that good cause  
17 supports this request for a 1 business day extension of time.

18       For the reasons set forth above, the parties respectfully approve this Stipulation and  
19 permit Plaintiff to file a response to Defendants' Objections on or before March 8, 2021.

20       /s/ *Kris Leonhardt*

21       /s/ *Paul S. Padda*

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22 Pavneet S. Uppal, Esq.  
23 Kris Leonhardt, Esq.  
24 Brian L. Bradford, Esq.

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Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.

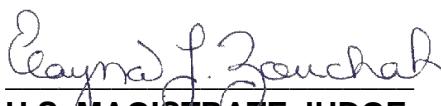
25       *Counsel for Defendants*

26       *Counsel for Christi El-Meligi,  
Netrisha Dalgai and Navajo Health  
Foundation – Sage Memorial  
Hospital, Inc.*

27       Dated: March 5, 2021

28       Dated: March 5, 2021

29       **IT IS SO ORDERED.**

30         
31       **U.S. MAGISTRATE JUDGE**